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United States of America
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SEALED

FILED

Apr 29, 2021

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 WESLEY TSUKAMOTO et al.,

15 Defendants.
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CASE NO. 1:21-CR-00115 DAD-BAM

MOTION AND PROPOSED ORDER TO
SEAL INDICTMENT

18 The government moves the Court, pursuant to Rule 6(e) of the Federal Rules of
19 Criminal Procedure, to order and direct that the Indictment returned by the Grand Jury
20 on April 29, 2021 charging the above defendants with violations of 21 U.S.C. §§ 846,
21 841(a)(1)– Conspiracy to Possess and Possession with Intent to Distribute
22 Methamphetamine; 21 U.S.C. § 841(a)(1) – Distribution of Methamphetamine; 21 U.S.C. §
23 841(a)(1) – Possession with Intent to Distribute Methamphetamine; 21 U.S.C. § 841(a)(1) –
24 Possession with Intent to Distribute Methamphetamine, Heroin and Cocaine; 18 U.S.C. §
25 922(g)– Felon in Possession of a Firearm; and 21 U.S.C. § 853(a), 18 U.S.C. § 924(d)(1) and
26 28 U.S.C. § 2461(c) – Criminal Forfeiture, be kept secret until all of the defendants named
27 in this Indictment are either in custody or have been given bail on these offenses; and
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1 further order that until such time as the defendants are in custody or have been given
2 bail, that no person shall disclose the finding of the Indictment or any warrants issued
3 pursuant thereto, except when necessary for the issuance and execution of the warrants.

4 Additionally, the government moves the Court to allow the attached redacted
5 version of the Indictment, as well as the docket as it pertains to the following defendants
6 to be unsealed: Wesley Tsukamoto, Jason Aguilar, Darcy Calafiore, Hector Hernandez,
7 and Cesar Estevan Rodriguez.

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9 DATED: April 29, 2021

Respectfully submitted,

10 PHILLIP A. TALBERT
11 Acting United States Attorney

12 By /s/ STEPHANIE M. STOKMAN
13 STEPHANIE M. STOKMAN
14 Assistant U.S. Attorney

15 IT IS SO ORDERED.

16 Dated: April 29, 2021

17 B. McAuliffe
18 BARBARA A. MCAULIFFE
19 U.S. Magistrate Judge
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